

January 30, 2015

Ms. Nancy Rumrill  
U S Environmental Protection Agency, Region 9  
Drinking Water Protection Section, Mail Code WTR-3-2  
75 Hawthorne Street  
San Francisco, CA 94105

RE: Draft Class III Underground Injection Control Area Permit  
Permit Number R9UIC-F'Y11-1  
Florence Copper, Inc.

Dear Ms. Rumrill,

The BHP test on the Florence Copper, Inc. property in the 1990's lasted only 100 days and resulted in 26 cases of exceeding water quality standards in effect at that time. This information has not been reviewed by the EPA as it relates to the current permit request from Florence Copper, Inc. All of the results of the 100 day test should be included and reviewed as part of the permit process for Florence Copper, Inc.

In 2012, Curis reported to the EPA that the total dissolved solids had risen 3 to 12 times higher than alert levels, this from the 1990's BHP test. This means that the water quality from the test is still being affected from the test 18 years ago and is ongoing. The permit application only provides for a five year monitoring even though the BHP test is still affecting water quality 18 years after that test. Obviously, the five year monitoring is not adequate to protect the residents of Florence from any potential contamination of the water quality.

The EPA should also recognize that since the 1990's, the area in question has changed dramatically from unincorporated to incorporated and the zoning changed to residential/small commercial. The property sits in the middle of the incorporated Town limits of Florence and there are over 2,000 homes built just northwest of the proposed test site, with another 8,000 scheduled for construction. The area surrounding the test site is owned by eight different land owners comprising 18,000 acres for proposed residential homes construction. The water for these existing and proposed homes comes directly from the aquifer in the proposed test site. Any contamination of this aquifer would have disastrous results for all the existing homes and future residential development.

It should also be noted that there is not one commercially operated in-situ copper mine anywhere in North America. Where in-situ mining for uranium has occurred, not one mine has been able to bring the water quality back to pre-mining conditions according to the USGS. This in itself should cause the EPA to look closer at the impact an approval for the test permit would have and even if it should be considered at all. The approval for testing in-situ mining is clearly

not in the best interests of the residents of the area who rely on the water quality to sustain life.

Please remember that the protection of our water source is and should be the primary focus of the EPA, not the monetary profit or jobs or the economy of the copper mining industry in Arizona.

Sincerely,

A handwritten signature in black ink, appearing to read 'Arne Hawkins', with a stylized, flowing script.

Arne Hawkins

FOIA Exemption 6

A large black rectangular redaction box covering the lower portion of the page, obscuring any text or content that might have been present.